

UNITED STATES BANKRUPTCY COURT
IN THE DISTRICT OF DELAWARE

2024 OCT 29 AM 11:47

In re:

FTX TRADING LTD., et al,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**RESPONSE TO DEBTOR'S TWELTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED
PROOFS OF CLAIM (CUSTOMER CLAIMS) BY CLAIMANT**

**Alin Florea, Creditor ("Creditor"), Responds to the Debtors' Omnibus Objection to Certain
Overstated Proofs of Claim (Customer Claims) (Case 22-11068-JTD, Doc 25700) as follows:**

Introduction

1. I am the Creditor, the holder of Claim No. 2315 against FTX Trading Ltd.
(alternatively West Realm Shires Services Inc.) ("Debtors"). The Claimant is filing a response with
regards to the objection of claim number 2315.
2. This response is filed in opposition to the Declaration of Rob Esposito in support of
the Debtors' One Hundred Third (Substantive) Omnibus Objection, wherein Debtors seek to
disallow or reduce Claim number 2315. The Debtors' objection should be overruled for the
reasons set forth below based on verified evidence, legal precedent, and principles of equity
and public policy.

Deposits

3. The Creditor has made several Ethereum (ETH) deposits into their FTX account, totaling 5.05258526 ETH, equivalent to \$6503.79 USD as of November 11, 2022 (\$1287.22 per USD conversion rate).

4. The Creditor has made several Binance Coin (BNB) deposits into their FTX account, totaling 14.80838453 BNB, equivalent to \$4291.77 USD as of November 11, 2022 (\$289.82 USD per BNB conversion rate).

5. Creditor seeks to recover a total of deposited account value \$10,795.55 USD of the combined ETH and BNB total deposits. The resulting expected recovery amount is \$12,846.71 which represents 119% of the November 2022 valuation of the total deposits of the account, in accordance with the approved plan.

Background of Deposits

6. These deposits are verifiable through the blockchain transaction Identification Numbers (IDs). There were no withdrawals made from the Claimant's FTX account after June 18, 2022. Schedule 1 attached includes the transaction details and evidence of the transactions with the deposit receipt notification email sent by FTX systems and the corresponding blockchain transaction confirmation IDs.

7. There were no withdrawals from the account or payments made by the Debtors since June 18, 2022.

Verified Evidence of Deposits

8. Creditor has provided conclusive blockchain verification of each deposit made to the FTX account (Schedule 1). The blockchain records, which are immutable and

publicly accessible, confirm that these deposits were made and received by FTX. A deposit receipt confirmation was sent by FTX via email for each deposit via their automatic system (Schedule 1). These receipts establish prima facie evidence of the claim's validity.

9. In re Allegheny Int'l, Inc., 954 F.2d 167, 174 (3d Cir. 1992), a validly filed claim is presumed valid unless sufficient contrary evidence is provided. The Debtors have failed to present credible evidence disputing these deposits. The Debtors provided no audited accounting records of the deposits or offsetting withdrawals from the Claimant's account in support of their objection.

10. The Debtors objected to the claim using a generic phrase stating "Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim".

Inaccurate Records and Debtors' Fraudulent Conduct

11. While the Creditor accepts that the correct legal entity may be modified as the Debtors suggest from "FTX Trading Ltd." to "West Realm Shires Services Inc.", in order to facilitate the claim funds recovery process, the Creditor on a balance of probabilities reasonably believes that the Debtors books and records are inaccurate and incorrect not reflecting the verified deposits made to the Creditor's account from 2021 to 2022.

12. The Debtors have failed to produce accurate financial records or documentation that would substantiate any withdrawals or offsetting transactions refuting the deposits made by the Creditor. Furthermore, Debtors have admitted to pervasive accounting failures during the bankruptcy process. The Debtors' books and records should not be relied upon without blockchain verified transaction identification numbers showing the deposits, with any verified withdrawals offsetting the net account balance.

13. It is widely reported and accepted that FTX engaged in fraudulent activities, including the illegal offering of unlicensed futures products and accounting irregularities. In *In re Maxwell Newspapers, Inc.*, 981 F.2d 85, 89 (2d Cir. 1992), the court noted that claims based on fraudulent conduct must be treated equitably. The absence of accurate accounting data should weigh in favor of the Creditor, particularly where fraud and mismanagement are present, as in this case.

Debtors Books and Records Should Not Be Relied Upon

14. The Debtors' books and records should not be relied upon to calculate claim amounts or net account deposits absent blockchain verified deposit transactions with verified transaction identification numbers. Only then can the net deposit amounts and true account balances be reconciled. The books and records should not be relied upon without blockchain verified deposit transactions and system generated confirmation receipts in order to properly calculate the total account deposit balance.

Illegality of Debtors' Operations

15. The FTX International Exchange was not registered with any securities regulators in the U.S. or Canada (where the Creditor resides) and was not authorized to

offer leveraged futures products to retail investors. FTX illegally offered the Creditor various futures leveraged products leading to losses and liquidations without consent. In other words, FTX was running an illegal unregistered securities casino game where the house always wins and retail investors lose their life savings. Under securities laws, including the U.S. Securities Act of 1933 and the Securities Exchange Act of 1934, transactions conducted through illegal operations are void.

16. The Debtors internal transactions related to its unlawful leveraged futures trading offerings must be considered null, and the Debtors cannot rely on those proprietary internal transactions to deny claims. Only the total value of the deposits to the account (offset by any blockchain verified withdrawals) are relevant to the current situation in calculating the total net account deposit value.

Unjust Enrichment and Public Policy

17. It is a fundamental maxim of law that no party should be allowed to profit from their own fraud. The principle of unjust enrichment is well established, as articulated in *Riggs v. Palmer*, 115 N.Y. 506 (1889), where the court held that one cannot profit by their own wrongdoing. The Debtors' retention of customer deposits without lawful basis would unjustly enrich the Debtors at the expense of innocent customers, in violation of this principle.

18. The Debtors' have provided no evidence showing external net account deposits and withdrawals in attempting to deny the claim. It is entirely reasonable to offset blockchain verified withdrawals to deposits in order to calculate the net difference since the inception of the account; however, no such audited withdrawal or deposit blockchain verified transaction IDs were provided.

19. The Debtors' accounting records were inaccurate and their cryptocurrency exchange operations offering proprietary leveraged futures products were fraudulent and illegal in violation of securities laws. No such leveraged futures product transactions existed outside of the FTX Exchange fraudulent enterprise internal machinations, and none were approved to be in operation by a securities regulator in Canada or the USA. Any internal trading transactions are null and void due to illegality. Only the external verified deposits offset by any withdrawals to the account are relevant.

20. Given the fraudulent conduct and lack of legal securities regulator registration, the Debtors' should not be permitted to retain the Creditor's deposited funds. Public policy strongly favors the return of misappropriated funds to their rightful owners as per the value of total verified external deposits of the account lifetime.

21. It is practically impossible for retail investors to recover deposits in other court venues and local jurisdictions such as Canada on the basis of a tort claim due to unjust enrichment, fraud, and illegality, because the current bankruptcy proceedings would result in an automatic stay of proceedings elsewhere. Due to the lack of re-emergence from bankruptcy of the FTX entities, and the length of the proceedings, it would be impossible to recover assets elsewhere due to limitation periods in small claims civil actions, and the lack of remaining assets for FTX Canada since there will be no re-emergence from bankruptcy.

Valuation of Claim

22. Creditor seeks to recover a total of \$12,846.71 (original total account value \$10,795.55 USD of the combined ETH and BNB total deposits from 2021 to 2022),

which represents 119% of the November 2022 valuation of the total deposits, in accordance with the approved plan.

23. Debtors have provided no evidence refuting the valuation of the deposit amounts and no blockchain verified transaction evidence (transaction ID confirmation numbers) in terms of deposits or offsetting account withdrawals. Therefore, the Creditor's calculations are accurate regarding the deposits made to the account and justified under the plan terms.

Public Policy: Excessive Legal Fees of Sullivan & Cromwell and the Impact on Retail Creditors

24. The ongoing bankruptcy proceedings of FTX Trading Ltd. highlight a concerning disparity between the treatment of institutional players and retail creditors. A prime example is the exorbitant legal fees charged by elite law firms like Sullivan & Cromwell LLP, which is central to the FTX bankruptcy case. Public policy demands that bankruptcy courts balance the interests of all creditors, including the most vulnerable — retail investors. However, the excessive compensation sought by Sullivan & Cromwell raises important questions about the fairness and integrity of the process, particularly when retail investors are left struggling to recover their deposits and their claims are generically objected to without any substantive evidence provided.

Excessive Fees and Unjust Burdens on Retail Creditors

25. According to multiple media reports, Sullivan & Cromwell is charging staggering legal fees in the FTX bankruptcy case. By March 2023, the law firm had already billed more than \$55 million for legal services related to the case. This equates to approximately \$2,000 per hour for some of the firm's top attorneys. Meanwhile, small retail claims are objected to and denied.

26. Over time, these fees have ballooned to figures exceeding \$100 million, a cost borne by the FTX estate, which diminishes the pool of funds available for creditor recoveries — especially for retail creditors who have suffered devastating losses.

27. While elite law firms are being enriched through high fees, individual investors who had accounts with FTX have seen their small and by comparison negligible claims either denied or severely delayed due to the complexities of the legal process. These are not institutional investors with deep pockets, but vulnerable retail clients (including part-time students such as the Creditor), many of whom entrusted their life savings to FTX, only to have their claims objected to based on inaccurate internal books and records from a fraudulent exchange that offered unlawful leveraged futures.

28. The claim process to merely reply to an objection requires a level of legal sophistication that is often beyond the reach of these small retail investors, especially those residing outside of the United States. With legal representation costs prohibitive and no access to small claims simplified rules, many retail creditors are left unrepresented, while firms representing the Debtors have far greater power and leverage to object to and deny claims via complicated rules and court filings.

29. Filing an objection is a mouse click away for a sophisticated firms that can file electronically and serve all parties in an instant; however, individual retail claimants (especially those residing internationally) have no such access, and need to navigate a complex system in order to mail and file a paper response with no assistance.

Disparity in Representation and Recovery

30. Public policy has long favored a fair and equitable distribution of assets in bankruptcy. Yet, the current process for retail creditors in the FTX case is anything but fair. Retail creditors are at an inherent disadvantage, as large law firms with their massive fees, are the ones shaping the process and dictating outcomes creating complicated and inaccessible processes for individual retail investors to seek a return of

disputed deposits. Directions to file a response are buried deep within long documents in dockets and filled with legalese, with no clear instructions as to how to practically file a response. There is an imbalance of power between Counsel for Debtors and individual retail Creditors.

31. This imbalance raises serious concerns regarding public policy, which aims to prevent precisely such an outcome — where wealthy Debtors and well-compensated professionals profit, while regular individual retail creditors are denied meaningful recovery of their initial account deposits as a result of generic Debtors' objections without evidence.

Bankruptcy Courts are Courts of Equity

32. In *Pepper v. Litton*, 308 U.S. 295 (1939), the Supreme Court emphasized that bankruptcy courts must ensure that no party is allowed to use the bankruptcy process for unfair self-enrichment at the expense of others. The case established the principle that bankruptcy courts are "courts of equity," and that they should ensure fairness in distribution to all creditors.

33. The excessive legal fees charged by Sullivan & Cromwell plus the fraudulent accounting practices exhibited by the Debtors stand in stark contrast to the above guiding principle. The bankruptcy system should not serve as a vehicle for legal professionals to reap disproportionate rewards, while individual creditors — who are supposed to be protected by the system — are left to bear the brunt of financial losses and have their claims disputed and denied without any evidence provided (blockchain verified transactions showing deposits offset by withdrawals, and audited account balances calculated from net deposits).

34. The complexity of bankruptcy claims, particularly involving cryptocurrency, presents yet another barrier for retail creditors. FTX customers, many of whom are unfamiliar with bankruptcy law, especially international customers, must navigate a confusing claims process,

often without the benefit of legal counsel. This stands in stark contrast to large institutional actors, who can afford top-tier legal representation, thus exacerbating the disparity in outcomes.

Public Policy and Judicial Oversight

35. The FTX bankruptcy proceedings are an opportunity for the Court to reaffirm its duty to uphold fairness and equity, especially for retail creditors who have no other means of recovery via a tort cause of action in other venues. The public policy implications are clear: allowing law firms to charge exorbitant fees while retail investor claims are contested and denied without any evidence of deposits or withdrawals, and no chance to recover their lost deposits in another venue, is not an equitable outcome.

36. The principles enunciated in *Pepper v. Litton* and *In Re Fibermark, Inc.*, 349 B.R. 385 (Bankr. D. Vt. 2006) suggest that the Court prioritize fairness and equity, ensuring that no creditor or professional takes unfair advantage of the process. Without such measures, the bankruptcy process will continue to perpetuate an unjust system where wealthy Debtors and professionals profit, while individual retail creditors are denied claims on technicalities without any substantive evidence of deposits and offsetting withdrawals provided. This is neither fair nor consistent with the spirit of bankruptcy law.

37. The Debtors have provided no substantive evidence of blockchain verified external deposits or withdrawals in order to calculate the true value of the account balance. The Creditor has provided evidence of blockchain verified deposits and receipts that indicate the total value of the account deposits.

Remedy

38. **THEREFORE**, Alin Florea (Creditor), respectfully requests that the Court deny and/or modify the objection to claim as stated above. For the foregoing reasons, the Debtors' objection to Claim No. 2315 should be overruled, and the Creditor's modified claim for \$10,795.55 (total deposits made to account) should be allowed (\$12,846.71 when applying the 119% plan recovery).

Dated: October 18, 2024

A.F.

/s/ Alin Florea

Alin Florea

Claimant 2315 (Self-represented)

1007-9180 Hemlock Dr,

Richmond, BC, V6Y 4J5, Canada

7789847684

alf912@g.harvard.edu

SCHEDULE 1
Blockchain Verified Account Deposit Transactions

Ethereum (ETH) Deposits

Deposit Date	ETH Amount	USD Value (as of 11-Nov-2022)	Blockchain Verified Transaction ID (txid)
29-May-21	0.30979054	398.77	0x0293a53d8955b9a1dde7bca4333ba3ba96cfa4369d100415537bc3e4498ccda2
18-Nov-21	0.08647893	111.32	0xbfb74596895f7b1fc46674045fab0b5213705a0f7fd52f3924c689e4b6e7a9444
07-Mar-22	0.09592331	123.47	0x4e93ad9aca6f1aaa8a76d8c3bdaa1b1c839c5e743592f8b89edaba661d89293e
12-May-22	0.37475842	482.40	0xba06dd506242ccff23e89a2fad07144299e85a2dfca292cbe187ba5b78e67007
14-May-22	0.267312	344.09	0x35f6a760ba090c7297082a35dbc86537f6ee841bbc6d9c1722d7434a68233fa1
15-May-22	0.738563	950.69	0x7d81cdd110672178a48ae2148c032686f8dc476fa5cd70055aa153f1dd96cece
16-May-22	0.229579	295.52	0x271400b8b08d1852d74ea7449d80bdc7eb1e164d70191bdaeeaa1357a26c34f55
18-May-22	0.392772	505.58	0x07fba95204113f818959880925a5224fd534f1811ab81d9b9f818bd43bbf525e
18-May-22	0.379652	488.70	0xfe418e432d7e08acb5be2556f58da53effb1f1f919524b3a1513c3b970002da1
26-May-22	0.20350206	261.95	0x21b17ab43f10bb7b07f8f16d3a826b146882be3da52e347492e1438801f121e8
06-Jun-22	0.421342	542.36	0x1a44371b2b01b1e5e8339ded4c26b88ae0ebc2573282f20d2bdb4b674a943538
06-Jun-22	0.253418	326.20	0x8c7e72026a9c11959e292fb1c0c43571b75832bd5510adcd792dca005144c48d
11-Jun-22	0.604811	778.52	0x34b629d2e949af1cf0d4be25d790466504092b4dbbf2678313a7386b03c5e550
18-Jun-22	0.694683	894.21	0x02f5c59a7f42392e49616e30ee15532842c248da0c84f1c01f80f65f0ae5944e
Total	5.05258526	6503.79	

Binance Coin (BNB) Deposits

Deposit Date	BNB Amount	USD Value (as of 11-Nov-2022)	Blockchain Verified Transaction ID (txid)
08-May-21	1.1995	347.639	C40609AD46EAD131D58086576CA449EC9B692BA4FFA3C02C1AA61B2680C1ACEF
09-May-21	0.6095	176.645	059BFB0F68EAB7DFF22F7B328FCDE846BB0E062206B88A7CFF6809BDEE3CCC78
13-May-21	0.6095	176.645	01DCD750EDDBAFB29A9A620E009FD9BCCEC9321C9140F5390E4BDCDE3EB1D101
13-May-21	0.6995	202.729	C5FBD4C9FD0248E479A7021966CDEA707ED484BC06B839441D2EDA83AE9F95F2
14-May-21	0.7095	205.627	EEEB03C9D8FF5A820244A3702DDAB03249A97D67F8E3E6B45AE5379868DC48C3
18-May-21	0.04146903	12.0186	F06ABB2A40CA23DB748381F62641A7B5B0D673F4CB3F734C7523359D41649431
21-May-21	0.7295	211.424	114D06C3AB60B77FCE33AC5D592FE55F049A87FF669FC2B2A603749DF9D089C1
24-May-21	3.0995	898.297	3FCA26F191263D60588E11CEB256A3B26085C59DDEC300353A6D9AA2974958DC
01-Jun-21	0.7995	231.711	5D7BBC781A682474201AFD356C95BA1EFD67CC70ACEC87ABAA92A3705252EB00
15-Nov-21	3.1495	912.788	14C292448A248FE466863C8303A1713DE99BECBFE35244A0C6097ECFDE5492E7
18-Nov-21	3.08803046	894.973	64F61256E2A9D1C4FCBC687472ABCA541780F78E7BAF7E610A592E55F7A3D9F6
18-Nov-21	0.04580317	13.2747	62C9F2D230AFB8A5D886F455B2CFD7A5FA3FA2D975F28F1B8B0D68A37F9F0CA1
20-Nov-21	0.02758187	7.99378	3355AC56C7F4390DA79D5C6DB21EBF0F4001A875306FF72AD8774E391C424016
Total	14.80838453	4291.77	

From: FTX Cryptocurrency Derivatives Exchange <support@ftx.com>
Sent: May 29, 2021 1:44 PM
To: mainaccount20174518@protonmail.com
Subject: ETH deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.30979054 ETH (txid 0x0293a53d8955b9a1dde7bca4333ba3ba96cfa4369d100415537bc3e4498ccda2) has been received and credited to your account.

FTX

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Telegram: FTX_Official
Twitter: FTX_Official

FTX Crypto Derivatives Exchange: <https://ftx.com>

From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: November 18, 2021 8:12 PM
To: mainaccount20174518@protonmail.com
Subject: ETH deposit received by BTCSHORT

Hello Alin Florin Florea,

Your deposit of 0.08647893 ETH (txid 0xbf74596895f7b1fc46674045fab0b5213705a0f7fd52f3924c689e4b6e7a9444) has been received and credited to your BTCSHORT account.

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Telegram: FTX_Official
Twitter: FTX_Official

FTX Crypto Derivatives Exchange: <https://ftx.com>

From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: March 7, 2022 1:41 PM
To: mainaccount20174518@protonmail.com
Subject: ETH deposit received by BTCSHORT

Hello Alin Florin Florea,

Your deposit of 0.09592331 ETH (txid 0x4e93ad9aca6f1aaa8a76d8c3bd8c3bdaa1b1c839c5e743592f8b89edaba661d89293e) has been received and credited to your BTCSHORT account.

FTX

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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>
To mainaccount20174518@protonmail.com
Date Thursday, May 12th, 2022 at 8:13 PM



Hello Alin Florin Florea,

Your deposit of 0.37475842 ETH (txid
0xba06dd506242ccff23e89a2fad07144299e85a2dfca292cbe187ba5b78e67007) has been received
and credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Saturday, May 14th, 2022 at 9:23 PM



Hello Alin Florin Florea,

Your deposit of 0.26731200 ETH (txid
0x35f6a760ba090c7297082a35dbc86537f6ee841bbc6d9c1722d7434a68233fa1) has been received
and credited to your BTCSHORT account.

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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>
To mainaccount20174518@protonmail.com
Date Sunday, May 15th, 2022 at 10:40 PM



Hello Alin Florin Florea,

Your deposit of 0.73856300 ETH (txid
0x7d81cdd110672178a48ae2148c032686f8dc476fa5cd70055aa153f1dd96cece) has been received
and credited to your BTCSHORT account.

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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Monday, May 16th, 2022 at 12:14 AM



Hello Alin Florin Florea,

Your deposit of 0.22957900 ETH (bid
0x271400b8b08d1852d74ea7449d80bdc7eb1e164d70191bdaeeaa1357a26c34f55) has been received
and credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Wednesday, May 18th, 2022 at 3:43 PM



Hello Alin Florin Florea,

Your deposit of 0.39277200 ETH (txid
0x07fba95204113f818959880925a5224fd534f1811ab81c9b9f818bd43bbf525e) has been received and
credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Wednesday, May 18th, 2022 at 6:45 PM



Hello Alin Florin Florea,

Your deposit of 0.37965200 ETH (txid
0xfe418e432d7e08acb5be2556f58da53effb1f1f919524b3a1513c3b970002da1) has been received and
credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Thursday, May 26th, 2022 at 6:37 PM



Hello Alin Florin Florea,

Your deposit of 0.20350206 ETH (txid
0x21b17ab43f10bb7b07f8f16d3a826b146882be3da52e347492e1438801f121e8) has been received
and credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Monday, June 6th, 2022 at 9:03 PM



Hello Alin Florin Florea,

Your deposit of 0.42134200 ETH (txid
0x1a44371b2b01b1e5e8339ded4c26b88ae0ebc2573282f20d2bdb4b674a943538) has been received
and credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Monday, June 6th, 2022 at 9:09 PM



Hello Alin Florin Florea,

Your deposit of 0.25341800 ETH (txid
0x8c7e72026a9c11959e292fb1c0c43571b75832bd5510adcd792dca005144c48d) has been received
and credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Saturday, June 11th, 2022 at 3:21 PM



Hello Alin Florin Florea,

Your deposit of 0.60481100 ETH (txid
0x34b629d2e949af1cf0d4be25d790466504092b4dbbf2678313a7386b03c5e550) has been received
and credited to your BTCSHORT account.

FTX



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ETH deposit received by BTCSHORT

From FTX <no-reply@notifications.ftx.com>

To mainaccount20174518@protonmail.com

Date Saturday, June 18th, 2022 at 1:50 PM



Hello Alin Florin Florea,

Your deposit of 0.69468300 ETH (txid
0x02f5c59a7f42392e49616e30ee15532842c248da0c84f1c01f80f65f0ae5944e) has been received and
credited to your BTCSHORT account.

FTX



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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 8, 2021 6:39 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 1.19950000 BNB (txid
C40609AD46EAD131D58086576CA449EC9B692BA4FFA3C02C1AA61B2680C1ACEF) has been received and credited to
your account.

FTX

Thank you for choosing to trade on FTX.

Join our community:
Wechat: ftexchange
Telegram: FTX_Official
Twitter: FTX_Official

FTX Crypto Derivatives Exchange: <https://ftx.com>

From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 9, 2021 12:48 AM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.60950000 BNB (txid 059BFB0F68EAB7DFF22F7B328FCDE846BB0E062206B88A7CFF6809BDEE3CCC78) has been received and credited to your account.

FTX

Thank you for choosing to trade on FTX.

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Telegram: FTX_Official
Twitter: FTX_Official

FTX Crypto Derivatives Exchange: <https://ftx.com>

From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 13, 2021 9:15 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.60950000 BNB (txid
01DCD750EDDBAFB29A9A620E009FD9BCCEC9321C9140F5390E4BDCDE3EB1D101) has been received and credited to
your account.

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 13, 2021 9:40 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.69950000 BNB (txid
C5FBD4C9FD024BE479A7021966CDEA707ED484BC06B8839441D2EDA83AE9F95F2) has been received and credited to
your account.

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 14, 2021 8:02 AM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.70950000 BNB (txid
EEEEB03C9D8FF5A820244A3702DDAB03249A97D67F8E3E6B45AE5379868DC48C3) has been received and credited to
your account.

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 18, 2021 7:28 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.04146903 BNB (txid F06ABB2A40CA23DB748381F62641A7B5B0D673F4CB3F734C7523359D41649431) has been received and credited to your account.

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 21, 2021 8:04 AM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.72950000 BNB (txid 114D06C3AB60B77FCE33AC5D592FE55F049A87FF669FC2B2A603749DF9D089C1) has been received and credited to your account.

FTX

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: May 24, 2021 3:24 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 3.09950000 BNB (txid
3FCA26F191263D60588E11CEB256A3B26085C59DDEC300353A6D9AA2974958DC) has been received and credited to
your account.

FTX

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Twitter: FTX_Official

FTX Crypto Derivatives Exchange: <https://ftx.com>

From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: June 1, 2021 3:32 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello mainaccount20174518@protonmail.com,

Your deposit of 0.79950000 BNB (txid
5D7BBC781A682474201AFD356C95BA1EFD67CC70ACEC87ABAA92A3705252EB00) has been received and credited to
your account.

FTX

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Twitter: FTX_Official

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: November 15, 2021 10:54 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received

Hello Alin Florin Florea,

Your deposit of 3.14950000 BNB (txid 14C29244BA248FE466863C8303A1713DE99BEC8FE35244A0C6097ECFDE5492E7) has been received and credited to your Main account.

FTX

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: November 18, 2021 5:01 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received by BTCSHORT

Hello Alin Florin Florea,

Your deposit of 3.08803046 BNB (txid 64F61256E2A9D1C4FCBC687472ABCA541780F78E7BAF7E610A592E55F7A3D9F6) has been received and credited to your BTCSHORT account.

FTX

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Twitter: FTX_Official

FTX Crypto Derivatives Exchange: <https://ftx.com>

From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: November 18, 2021 7:28 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received by BTCSHORT

Hello Alin Florin Florea,

Your deposit of 0.04580317 BNB (txid 62C9F2D230AFB8A5D886F455B2CFD7A5FA3FA2D975F28F1B8B0D68A37F9F0CA1) has been received and credited to your BTCSHORT account.

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Twitter: FTX_Official

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From: support@ftx.com on behalf of FTX Cryptocurrency Derivatives Exchange
<support@ftx.com>
Sent: November 20, 2021 9:37 PM
To: mainaccount20174518@protonmail.com
Subject: BNB deposit received by BTCSHORT

Hello Alin Florin Florea,

Your deposit of 0.02758187 BNB (txid 3355AC56C7F4390DA79D5C6DB21EBF0F4001A875306FF72AD8774E391C424016) has been received and credited to your BTCSHORT account.

FTX

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FTX Crypto Derivatives Exchange: <https://ftx.com>

UNITED STATES BANKRUPTCY COURT
IN THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., et al,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date he served a copy of the attached Response to Objection to claim upon the following parties via email on October 18, 2024 to:

(a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Christian P. Jensen (jensenc@sullcrom.com) and David M. Rosenthal (rosenthald@sullcrom.com)

(b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis (landis@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com)

A.F.

/s/ Alin Florea

Alin Florea

Claimant (Self-represented)

1007-9180 Hemlock Dr,

Richmond, BC, V6Y 4J5, Canada

778-984-7684

ALF912@g.harvard.edu

Alin Florea

1007-9180 Hemlock Dr

Richmond, BC, V6Y 4J5, Canada

Attention: Filing Response to Objection C

Office of the Clerk of the United States B

Delaware 302-252-2900

824 Market Street, 3rd Floor

Wilmington, Delaware 19801

USA



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